

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

<b>IN RE:</b>	)	<b>Case No: 23-44064</b>
	)	
<b>NICHOLAS ROBERT VENEGONI</b>	)	<b>Chapter 13</b>
<b>HILLARY VENEGONI</b>	)	
	)	
<b>Debtors</b>	)	

**TRUSTEE'S OBJECTION TO MOTION TO IMPOSE AUTOMATIC STAY**

Comes now Diana S. Daugherty, Standing Chapter 13 Trustee, and states as follows:

Debtor's prior two cases were both dismissed for failure to make plan payments. In the case filed prior to this case, Debtor had obtained an Order extending the automatic stay. In the present case, Debtors still have not filed a Chapter 13 plan seven days after the bankruptcy petition was filed. The Trustee has not received any pay advices or tax returns for the Debtors. This case does not appear to have been filed in good faith and the stay should not be imposed.

Dated: November 15, 2023  
RSPGEN--JMP

/s/ Jennifer M. Pontus  
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Jennifer M. Pontus MO65660  
Attorney for Trustee  
P.O. Box 430908  
St. Louis, MO 63143  
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**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing document was filed electronically on November 15, 2023, with the United States Bankruptcy Court, and has been served on the parties in interest via e-mail by the Court's CM/ECF System as listed on the Court's Electronic Mail Notice List.

I certify that a true and correct copy of the foregoing document was filed electronically with the United States Bankruptcy Court, and has been served by Regular United States Mail Service, first class, postage fully pre-paid, addressed to those parties listed on the Court's Manual Notice List and listed below on November 15, 2023.

NICHOLAS ROBERT VENEGONI  
HILLARY VENEGONI  
803 STREIFF  
BALLWIN, MO 63011

/s/ Jennifer M. Pontus  
\_\_\_\_\_  
Jennifer M. Pontus MO65660